

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>07-258</u>
v.	:	DATE FILED: <u>August 20, 2008</u>
GREGORY JONES, a/k/a "G," LLOYD WASHINGTON, JR., a/k/a "Bub," RONALD CRAWFORD, a/k/a "Coat," a/k/a "Coulter," a/k/a "C"	:	VIOLATIONS: 21 U.S.C. §§ 846, 841(b)(1)(A) (conspiracy to distribute five kilograms or more of cocaine - 1 count) 21 U.S.C. §§ 846, 841(b)(1)(A) (attempted possession with intent to distribute five kilograms or more of cocaine- 1 count) 18 U.S.C. § 924(c) (possession of firearm in furtherance of drug trafficking crime - 1 count) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture
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SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about May 15, 2006 through on or about February 7, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**GREGORY JONES,
a/k/a "G,"
LLOYD WASHINGTON, JR.,
a/k/a "Bub,"
and
RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C"**

conspired and agreed, together and with Niema Simpson and Mark Rimes, charged elsewhere,

and other persons known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute five kilograms or more, that is, at least 29.5 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants GREGORY JONES, LLOYD WASHINGTON, JR., and RONALD CRAWFORD agreed with Niema Simpson and Mark Rimes to pick up, transport, and distribute kilograms of cocaine, which had been sent from a location in California to Philadelphia, Pennsylvania.

3. At the direction of defendants GREGORY JONES and LLOYD WASHINGTON, JR., defendant RONALD CRAWFORD, and Niema Simpson and Mark Rimes, and others known and unknown to the grand jury retrieved and transported parcels containing kilograms of cocaine that were delivered to United Parcel Service (“UPS”) stores in Philadelphia, Pennsylvania.

4. Defendants GREGORY JONES, LLOYD WASHINGTON, JR., and RONALD CRAWFORD, and Niema Simpson communicated with each other and with others known and unknown to the grand jury using cellular telephones concerning the retrieval of the UPS parcels containing kilograms of cocaine.

5. Defendants GREGORY JONES, LLOYD WASHINGTON, JR., and RONALD CRAWFORD possessed at least 150 kilograms of cocaine for distribution.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants GREGORY JONES, LLOYD WASHINGTON, JR., and RONALD CRAWFORD, and Niema Simpson and Mark Rimes, charged elsewhere, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

The Set Up: Opening Mailboxes

_____ On or about May 15, 2006:

1. Defendant LLOYD WASHINGTON, JR. drove with Niema Simpson and Person # 1, a person known to the grand jury ("Person #1"), to the UPS store at 211 South Street in Philadelphia, to open a mailbox.
2. At the direction of defendant LLOYD WASHINGTON, JR., Niema Simpson and Person # 1 opened Mailbox # 529 at the UPS store at 211 South Street in Philadelphia, under the firm name "Precision Global Comm, Inc."
3. Later the same day, defendant LLOYD WASHINGTON, JR. drove with Niema Simpson and Person # 1 to another UPS store at 1735 Market Street in Philadelphia to open a mailbox.
4. At the direction of defendant LLOYD WASHINGTON, JR., Niema Simpson and Person # 1 opened Mailbox # 448 at the UPS store at 1735 Market Street in Philadelphia, under the firm name "Genesis Designer Corp."

Cocaine Pick-Ups

On numerous occasions between May 15, 2006 and February 7, 2007:

5. Defendant GREGORY JONES informed defendant LLOYD WASHINGTON, JR. when parcels containing cocaine were scheduled to arrive at the UPS stores at 211 South Street and 1735 Market Street.

6. Defendants LLOYD WASHINGTON, JR. and RONALD CRAWFORD and Niema Simpson, and persons unknown to the grand jury, picked up parcels containing cocaine from the UPS store at 211 South Street. On some occasions, defendant WASHINGTON and Simpson, and persons unknown to the grand jury, picked up parcels containing cocaine from the UPS Store at 1735 Market Street.

7. Defendants LLOYD WASHINGTON, JR. and RONALD CRAWFORD and Niema Simpson, and persons unknown to the grand jury, transported the cocaine they picked up from the UPS stores to a house in Philadelphia. Defendant GREGORY JONES arrived at this same house and departed with some of the cocaine.

8. Defendants GREGORY JONES and LLOYD WASHINGTON, JR. paid defendant RONALD CRAWFORD and Niema Simpson, Person # 1, and other persons unknown to the grand jury in United States currency in exchange for transporting the cocaine they picked up from the UPS stores to the house in Philadelphia.

9. Between on or about May 15, 2006 and on or about February 7, 2007, defendant RONALD CRAWFORD possessed a loaded Glock 9-mm firearm.

The Delivery and Pickup of Approximately 29.5 Kilograms of Cocaine

On or about February 7, 2007:

10. At approximately 9:30 a.m., defendant LLOYD WASHINGTON, JR. drove in a silver Buick Rendezvous with Mark Rimes to the vicinity of the UPS store at 211 South Street in Philadelphia.

11. At approximately 9:50 a.m., defendant LLOYD WASHINGTON, JR. got out of the Buick Rendezvous, observed an UPS truck driver make deliveries to the UPS store at 211 South Street, walked to the rear of the UPS truck, and observed parcels remaining in the rear of the truck.

12. At approximately 11:45 a.m., defendant LLOYD WASHINGTON, JR. and Mark Rimes observed another UPS truck driver deliver two parcels that originally contained 29.5 kilograms of cocaine to the UPS store at 211 South Street.

Counter-Surveillance

On or about February 7, 2007:

13. At approximately 11:50 a.m., after defendant LLOYD WASHINGTON, JR. and Mark Rimes circled the block of 211 South Street in the Buick Rendezvous, defendant WASHINGTON got out of the car, walked the 200 block of South Street, and looked into each parked vehicle on the block.

14. At approximately 12:10 p.m., defendant LLOYD WASHINGTON, JR. and Mark Rimes circled the block of 211 South Street in the silver Buick Rendezvous.

15. At approximately 12:40 p.m., Mark Rimes got out of the Buick Rendezvous, walked the 200 block of South Street, looked into parked vehicles on the block, entered the UPS store at 211 South Street, and then returned to the Buick Rendezvous.

16. At approximately 12:50 p.m., defendant LLOYD WASHINGTON, JR. got

out of the Buick Rendezvous, entered the UPS store at 211 South Street, and then returned to the Buick Rendezvous.

17. At approximately 1:20 p.m., Mark Rimes got out of the Buick Rendezvous, walked the 200 block of South Street, and looked into each parked vehicle on the block.

18. At approximately 1:30 p.m., Mark Rimes got out of the Buick Rendezvous, walked the 200 block of South Street and the 600 block of American Street, and looked into parked vehicles on the blocks.

19. At approximately 2:03 p.m., defendant LLOYD WASHINGTON, JR. and Mark Rimes parked the silver Buick Rendezvous at the intersection of Second and South Streets.

The Final Cocaine Pickup

On or about February 7, 2007:

20. At approximately 2:07 p.m., defendant RONALD CRAWFORD drove a Victory taxicab, in which Niema Simpson was a passenger, to 211 South Street and parked in front of the UPS store.

21. At approximately 2:07 p.m., Niema Simpson got out of the taxicab, entered the UPS store, and picked up two parcels that originally contained 29.5 kilograms of cocaine and put them in the trunk of the Victory taxicab being driven by defendant RONALD CRAWFORD. The parcels were addressed to "Timothy D. Chang, Precision Global Comm., 211 South Street Rm #529, Philadelphia, PA 19147."

22. Defendant RONALD CRAWFORD then drove the Victory taxicab, in

which Niema Simpson was a passenger, and the two UPS parcels to the intersection of Second and South Streets, where defendant CRAWFORD followed the Buick Rendezvous driven by defendant LLOYD WASHINGTON, JR. and Mark Rimes onto northbound I-95 and exited at Girard Avenue, where they were all arrested by Philadelphia Police officers and members of the High Intensity Drug Trafficking Area (“HIDTA”) Task Force.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 7, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**GREGORY JONES,
a/k/a "G,"
LLOYD WASHINGTON, JR.,
a/k/a "Bub,"
and
RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C"**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, five kilograms or more, that is, approximately 29.5 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 7, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C"**

knowingly possessed a firearm, that is, a loaded Glock 9-mm firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess cocaine with the intent to distribute cocaine, and attempted possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

Forfeiture - 21 U.S.C. 853

1. As a result of the violations of Title 21, United States Code, Section 846, set forth in this second superseding indictment, defendants

**GREGORY JONES,
a/k/a "G,"
LLOYD WASHINGTON, JR.,
a/k/a "Bub,"
and
RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C"**

shall forfeit to the United States:

- (a) any and all real or personal property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations; and
- (b) any and all real or personal property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

Forfeiture - 18 U.S.C. 924(d)

3. As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this second superseding indictment, defendant

**RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C"**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of this offense, including, but not limited to a loaded Glock 9-mm firearm.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney